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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE: BARD IVC FILTERS PRODUCTS LIABILITY LITIGATION

MD No. 02641

**JOINT STIPULATION FOR ENTRY
OF CASE MANAGEMENT ORDER
CONCERNING REDACTIONS OF
MATERIAL FROM ADDITIONAL
ADVERSE EVENT REPORTS,
COMPLAINTS, AND OTHER
DOCUMENTS**

The Parties hereby stipulate to entry of the Proposed Case Management Order No. ___ for the Redactions Of Material From Additional Adverse Event Reports, Complaints, And Other Documents. Defendants anticipate producing additional and updated adverse event reports and complaint files maintained pursuant to 21 U.S.C. § 360i, 21 C.F.R. § 803.18, and 21 C.F.R. § 820.1 - .250 as well as documents relating to those adverse events and complaints files. The redaction of individually-identifying information relating to non-parties is necessary to comply with 21 CFR § 20.63(f) and other applicable laws, statutes, and regulations. Accordingly, the Parties submit the attached Proposed Case Management Order to set the protocols for such redactions and request the Court enter the proposed Order.

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1 So Stipulated to this 23rd day of December 2015.
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SCARBOROUGH LLP

4 By: /s/ Paul Stoller

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 23rd day of December 2015, I electronically
3 transmitted the attached document to the Clerk's Office using the CM/ECF System for
4 filing and transmittal of a Notice of Electronic Filing.

5 */s/ Nancy Jo Koenes*

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